

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In Re:) 19-10312
)
Michelle Sloop,) Chapter 13
)
Debtor(s).) Judge A. Benjamin Goldgar

NOTICE OF MOTION

To the following persons or entities who were served electronically by the Bankruptcy Court:

Glenn Stearns, Ch. 13 Trustee: mcguckin_m@lisle13.com

To the following persons or entities who were served via regular U.S. Mail:

See attached service list.

PLEASE TAKE NOTICE that on May 22, 2020 at 9:30 am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable A. Benjamin Goldgar, Park City Branch Court, 301 S. Greenleaf Ave., Courtroom B, Park City, IL 60085 (or any other place posted, or before any other Judge who may be sitting in his/her place and stead), and present the attached **Motion to Modify Plan**, at which time and place you may appear.

A party who objects to the motion and wants it called must file a Notice of Objection no later than two (2) business days before the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing before the date of presentment.

_____/s/ John J. Ellmann

CERTIFICATE OF SERVICE

The undersigned does hereby certify that copies of this Notice and attachments were served to the above persons or entities, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, with proper postage prepaid, or served electronically by the Bankruptcy Court, before 5:00 p.m. on April 30, 2020.

_____/s/ John J. Ellmann

John J. Ellmann, A.R.D.C. #6257894
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES, LLC
790 Chaddick Drive
Wheeling, IL 60090
847/ 520-8100

To the following persons or entities who were served via regular U.S. Mail:

Michelle Sloop
38148 N. Harper Road
Beach Park, IL 60087

MIDLAND FUNDING LLC
PO BOX 2011
WARREN, MI 48090

M & T Bank/ Lakeview Loan Servicing
c/o Codilis & Associates, P.C.
15W030 North Frontage Road, Ste. 100
Burr Ridge, IL 60527

Consumers Cooperative Credit Union
c/o Keynote Consulting Inc.
220 W Campus Dr. #102
Arlington Heights IL 60004

U.S. Department of Housing and Urban
Development
451 7th Street, SW
Washington, DC 50410

Lakeview Loan Servicing, LLC
M&T Bank
PO Box 840
Buffalo, NY 14240

T Mobile/T-Mobile USA Inc.
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118

Capital One, N.A.
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Premier Bankcard, LLC
Jefferson Capital Systems LLC Assignee
PO Box 7999
Saint Cloud, MN 56302-9617

AT&T Corp.
c/o AT&T Services, Inc.
Karen A Cavagnaro - Lead Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921

OneMain
P.O. Box 3251
Evansville, IN 47731-3251

SYNCHRONY BANK
c/o Weinstein & Riley, PS
2001 Western Ave., Ste. 400
Seattle, WA 98121

The Illinois Tollway
PO Box 5544
Chicago, IL 60680

Kathleen R Woods Dmd Dental Cl
191 N Green Bay Rd
Waukegan, IL 60085

Commonwealth Edison Company
Bankruptcy Department
1919 Swift Drive
Oak Brook, IL 60523

North Shore Gas
Bankruptcy Department
200 E. Randolph Street
Chicago, IL 60601

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

In Re:)	19-10312
)	
Michelle Sloop,)	Chapter 13
)	
Debtor(s).)	Judge A. Benjamin Goldgar

MOTION TO MODIFY PLAN

NOW COMES the Debtor, by and through her attorneys, David M. Siegel & Associates, LLC, and in support of this Motion states as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. On April 10, 2019, the Debtor filed a voluntary petition for relief pursuant to Chapter 13 under Title 11 USC, Glenn Stearns was appointed trustee, and the plan was confirmed on June 28, 2019.
3. The Debtor fell behind in her Trustee payments because she had to stop working in 2019 because she had medical problems. She was finally able to return to work and started a new job on February 17, 2020. That employment has been terminated due to the Covid-19 Pandemic.
4. The Debtor has applied for unemployment benefits and says that her industry will begin hiring again in May. So she expects her income to resume, but probably lower than before.
5. She will be able to resume payments to the Trustee in a decreased amount, but cannot cure the default.
6. The Debtor proposes to amend her chapter 13 plan pursuant to 11 U.S.C. §1329 to decrease the monthly Trustee payment amount and to defer the payment default to the end of the plan. The Debtor makes this proposal in good faith and with the intention of completing her chapter 13 plan.

7. Decreasing the Trustee payment amount and deferring the payment default will not cause the confirmed chapter 13 plan to run longer than 84 months.

WHEREFORE the Debtor prays this Honorable Court enter an order modifying the plan and for other such relief as this Court deems just and proper.

Respectfully Submitted,

/s/ John J. Ellmann

John J. Ellmann A.R.D.C. #6257894
Attorney for the Debtors

DAVID M. SIEGEL & ASSOCIATES, LLC
Attorneys for the Debtor(s)
790 Chaddick Drive
Wheeling, IL 60090
847/ 520-810